CAFO FACILITY INSPECTION REPORT

OFFICE NO: PCA SYSTEM TASK NO:

INSPECTOR(S): Anthony D'Angelo (PG Environmental, LLC)

FACILITY INFORMATION

8365965001 WDID NUMBER	**Amos DeGroot** OWNER NAME	**SD Farms II** FACILITY NAME
CAG018001 NPDES NUMBER	**Ex. 6 Personal Privacy (PP)**	
R8-2007-0001 RWQCB ORDER NO.	**Ontario, CA 91762** OWNER CITY AND STATE	**Ontario, CA 91761** FACILITY CITY AND STATE
03/06/2013 SCHEDULED INSPECTION DATE	**Amos DeGroot** OWNER CONTACT	**Nancy Goedhart** FACILITY CONTACT
03/06/2013 ACTUAL INSPECTION DATE	**Ex. 6 Personal Privacy (PP)** OWNER PHONE NO.	FACILITY PHONE NO.
Unknown RECEIVING WATER	Ex. 6 Personal Privacy (PP) FACILITY LATITUDE	Ex. 6 Personal Privacy (PP) FACILITY LONGITUDE

INSPECTION TYPE

- ☐ (A1) "A" type compliance -- (EPA Type S)
- ☒ (B1) "B" type compliance -- (EPA Type C)
- ☐ (02) Noncompliance follow-up - Correction of a previously identified violation
- ☐ (03) Enforcement follow-up - Enforcement action is being met
- ☐ (04) Complaint - Complaint
- ☐ (05) Pre-requirement
- ☐ (06) Miscellaneous

_____ (Type) NOTE: If this is an EPA inspection not mentioned above, please note type (e.g., biomonitoring, performance audit, diagnostic, etc.)

No	Was the inspection pre-announced?
Yes	Were potential violations noted during this inspection?
No	Was this a quality assurance-based inspection?
No	Were bioassay samples collected?
No	Were water quality samples collected?

INSPECTION SUMMARY

The overall Facility rating, on a 1 (Unreliable) to 5 (Very Reliable) scale, was determined to be: 3 = Satisfactory.

SD Farms II (hereinafter Facility) (refer to Photo 1) was rated "Satisfactory" due to the following items:

- **The Engineered Waste Management Plan (EWMP) was not fully implemented onsite at the Facility at the time of the inspection (i.e., Pond A) (refer to Photos 7 through 14)**
- **A release of manure offsite along the northern Facility perimeter onto the Chino Avenue right-of-way was observed (refer to Photos 19 and 20)**
- **An unidentified source of process wastewater was observed to have been previously discharged offsite along the northern Facility perimeter onto the Chino Avenue right-of-way (refer to Photos 21 through 25)**

INSPECTOR DATA

INITIALS __AJD__ SIGNATURE _____ DATE_____03/06/2013_____

CIWQS DATA ENTRY DATE: _____ REGIONAL BOARD FILE NUMBER: _____

FOR INTERNAL USE: REVIEWED BY: (1)_____ (2) _____ (3) _____

REPORT PREPARED BY: Anthony D'Angelo (PG Environmental, LLC) ON 03/19/2013

EPA SUGGESTED INSPECTION CHECKLIST

☒ Permit	☐ Flow Measurement	☐ Pretreatment	☒ Operations & Maintenance
☒ Records/Reports	☐ Laboratories	☐ Compliance Schedules	☐ Sludge Disposal
☒ Facility Site Review	☐ Eff/Receiving Waters	☐ Self- Monitoring	☐ Other

POTENTIAL VIOLATIONS

1. The EWMP was not reflective of current Facility conditions at the time of the inspection, and had not been fully implemented onsite at the Facility, as required by Provision VII.C.3.b of the Permit (refer to Photos 7 through 14).

Description of Potential Violation: **Refer to Item Nos. 1 and 2 of the 'Engineered Waste Management Plan Review' section of this report for additional details.**

2. A release of manure and process wastewater offsite to the north was observed onto the Chino Avenue right-of-way (refer to Photos 19 through 25). Effluent Limitations V.A.1.a of the Permit states pollutants may be discharged from the Facility if "the production area is designed, constructed, operated, and maintained to contain all manure, litter, and process wastewater including the runoff and the direct precipitation from a 25-year, 24-hour rainfall event." In addition, Discharge Prohibition IV.A states that the "Discharge of process wastewater and/or storm water runoff from manured areas to property not owned or controlled by the discharger, except as authorized by this order, is prohibited." Discharge Prohibition IV.B of the Permit states that a "disposal of manure to land is prohibited."

Description of Potential Violation: **Refer to item Nos. 1 and 2 of the 'Facility Housekeeping, Wastewater, and Manure Information' section of this report for additional details.**

Date of Potential Violation: **N/A**

Date of Potential Violation Determination: **March 6, 2013**

INSPECTION OBSERVATIONS

On March 6, 2013, a Concentrated Animal Feeding Operation (CAFO) inspection was conducted for Santa Ana Water Board Order No. R8-2007-0001 - 'General Waste Discharge Requirements for Concentrated Animal Feeding Operations (Dairies and Related Facilities) within the Santa Ana Region', NPDES General Permit No. (CAG018001) at SD Farms II in Ontario, California (refer to Photo 1). The inspector met with Mr. Simon Leul (Attendant, SD Farms II) at approximately 11:15 AM on March 6, 2013. The inspector spoke with Ms. Nancy Goedhart (Facility Manager, SD Farms II) via phone in order to locate the Facility EWMP, NMP, previous annual reports, and inspection documentation at the Facility office. Mr. Leul joined the inspector for the records review and during the Facility site visit. The inspector held a closing conference with Mr. Leul and Ms. Goedhart (via phone) at the conclusion of the inspection. During the closing conference, the inspector reviewed the preliminary inspection findings with Facility representatives.

The Facility is a 51-acre dairy farm with an animal population of approximately 1,235 milking cows, 131 dry cows, and 65 heifers at the time of the inspection. It should be noted that the 'Existing Animal Population' section of the EWMP states the maximum number of mlking cows for the Facility is 1,080, and the maximum number of dry cows at the Facility is 200. Process wastewater from milking and cow washing activities is collected into a sump on the west side of the milking barn (refer to Photos 2 and 3). Process wastewater is then either pumped south to Pond A located in the southern portion of the Facility or to a standpipe on the the north side of the north-central corral, adjacent to Chino Avenue (refer to Photos 4, and 7 through 15). From the standpipe, the process wastewater is then piped to the northwest portion of the Facility where it can be land-applied via approximately 28 valve heads into a pasture for irrigation and infiltration (refer to Photos 4, 5, and 6). Pond A is divided into two sections by a low lying berm/access road which are hydraulically connected via a polyvinyl chloride (PVC) pipe (refer to Photos 7, and 9 through 13). Mr. Leul stated the separation allows pond solids to settle in the first smaller section of the pond during low water times prior to flowing through the PVC pipe and into the larger section of Pond A. This consolidates the solids accumulation area which allows for easier cleaning and removal during the dry season (refer to Photo 13). If the pond water level rises over approximately three (3) feet, water overtops the berm and the two (2) sections of Pond A combine into one (1) pond. Surface runoff from all corrals naturally flows south into Pond A. At the time of the inspection, process wastewater from the milking barn was being piped into Pond A located at the southern portion of the Facility (refer to Photos 13 and 14). Mr. Leul stated that Pond A was last cleaned of solids in August 2012.

Mr. Leul stated that the corrals are cleaned three (3) times per year. The inspector noted that seven (7) haul events occurred during the 2012 reporting period. Manure that is removed from the Facility is hauled offsite by Celaya Trucking and Franco Trucking and is diposed of typically at Luke Farms, Cleveland Farms, Chino Prison, and Recycled Wood Products composting facility. Manure tracking manifests were maintained of all haul events. The Discharger leases and operates a 30-acre cropland immediately south of the Facility at Euclid Avenue and Shaefer Avenue for feed-growing operations (refer to Photos 16 and 17). During the 2012 reporting period, 8,308 tons of manure was land-applied to this cropland. The 30-acre parcel is equipped with two wastewater ponds located in the northeast corner of the property (refer to Photo 18). A concrete spillway was identified in the southeastern corner of Pond A (refer to Photos 13 and 15). The ponds can be utilized for emergency storage for Facility process wastewater and storm water runoff, and are used to contain wastewater that will be used for irrigation for the croplands duing the summer months. Manifests are documented and maintained when water is tranfered from Pond A to the two wastewater ponds at the Discharger's offsite cropland property. The two wastewater ponds at the cropland property were dry at the time of the inspection (refer to Photo 18). Livestock grazing activities does not occur at the cropland property. Crops are harvested, bundled, and brought to the Facility for use in the feed lanes. A Nutrient Management Plan (NMP) had been developed for the adjacent cropland property and was retained onsite and reviewed as a component of this inspection. Mr. Leul stated that all mortalities are removed from the Facility immediately by Stiles Animal Removal, Inc.

FACILITY

CAFO Size: **Large** (at time of inspection)
Total Acres: **51**
Production Area Acres: **21.41**

CONTAINMENT STRUCTURES

Wastewater Lagoons: **1**
Evaporation Ponds: **0**
Catch Basins: **0**
Depth Markers: **1**
Other: **N/A**

ANIMALS ONSITE DURING INSPECTION

Milk Cows: **1,235**
Dry Cows: **131**
Heifers: **65**
Calves: **0**
Other: **N/A**

ANNUAL REPORT REVIEW

ANNUAL REPORT

Monitoring Year: **2012**
Reviewed: **Yes**
Signed & Certified: **Yes**
Submittal Date: **January 8, 2013**

REPORTED ANIMAL POPULATION

Milk Cows: **1,179**
Dry Cows: **153**
Heifers: **93**
Calves: **0**
Other: **N/A**

MANURE INFORMATION

Amount of manure spread on cropland at the Facility: **None**

Amount of manure hauled away from the Facility: **10,900 Tons**

Name and location of the composting operation, or, if the manure was hauled to cropland, the owner or tenant, and the destination address:

S
A

Ex. 6 Personal Privacy (PP)

ENGINEERED WASTE MANAGEMENT PLAN (EWMP) REVIEW

Did the inspector review the EWMP in the RWQCB file?	**Yes**
Did the Facility have a copy of the EWMP on-site and available for review?	**Yes**
EWMP preparation date:	**December 2008**
EWMP prepared by:	**Sierra Engineering Services**
Santa Ana RWQCB EWMP acceptance date:	**Unknown**
EWMP was certified by the Facility's engineer/consultant on:	**Unknown**

1. The EWMP was not reflective of current Facility conditions at the time of the inspection. Specifically, the 'Existing Animal Population' section of the approved EWMP states the maximum number of milking cows at the Facility is

1,080, and the maximum number of dry cows at the Facility is 200. In addition, the 'Proposed Design Modification' sectiion of the EWMP states that "the holding capacity for the milking cows at the dairy is 1,080. There is no plan to increase the number of milking cows beyond 1,080." At the time of the inspection, the animal population was approximately 1,235 milking cows, 131 dry cows, and 65 heifers. The number of animal units at the Facility at the time of the inspection was larger than the maximum number allowed by the approved EWMP. As a result, the Discharger was not fully implementing the approved EWMP. The Discharger shall fully implement the approved EWMP as required by Provision VII.C.3.b of the Permit.

2. The EWMP was not fully implemented onsite at the Facility as required by the Permit. The inspector observed that Pond A had been divided into two sections by a low lying north-south berm/access road on the east side of Pond A which are hydraulically connected via a PVC pipe (refer to Photos 7 through 14). The eastern portion of Pond A is approximately one-quarter the size of the western portion. Mr. Leul stated the separation allows pond solids to settle in the smaller eastern section of the pond during low water times prior to flowing through the PVC pipe and into the larger western section of Pond A. According to Mr. Leul, this consolidates the solids which allows for easier cleaning and removal during the dry season. If the pond water level rises over approximately three (3) feet, water overtops the berm/access road and the two (2) sections of Pond A combine into one (1) pond. The approved EWMP Site Plan does not identify the north-south berm/access road through Pond A; therefore, the berm/access road was potentially reducing the overall capacity of Pond A. As a result, the Discharger was not fully implementing the approved EWMP. The Discharger shall fully implement the EWMP as required by Provision VII.C.3.b of the Permit.

NUTRIENT MANAGEMENT PLAN (NMP) REVIEW (IF APPLICABLE)

Did the Facility have a copy of the NMP on-site and available for review?	**Yes**
Date NMP was prepared:	**February 2009**
NMP prepared by:	**Sierra Engineering Services**
Santa Ana RWQCB NMP acceptance date:	**Unknown**

1. A copy of the Facility Nutrient Management Plan (NMP) was retained onsite and reviewed as a component of the inspection. The NMP appeared adequate and was fully implemented onsite at the time of the inspection.

FACILITY HOUSEKEEPING, WASTEWATER, AND MANURE INFORMATION

Typical Depth of Manure in Corrals (in inches):	**0-4**
Estimated Freeboard in Fullest Lagoon (in feet):	**4**
Date of Last Lagoon Solids Removal, per Facility Representative:	**August 2012**
Disposal Location for Lagoon Solids:	**Refer to the 'Annual Report Review' section of this report for additional details**

REVIEW OF FACILITY HOUSEKEEPING

1. The inspector observed, during the inspection, a release of manure offsite to the north from the north-central corral onto the Chino Avenue right-of-way (refer to Photos 19 and 20). Mr. Leul stated that the release of manure offsite at the north-central corral was common, and that the manure is removed from the right-of-way periodically when the corral is cleaned. The north-central corral was last cleaned in November 2012. Effluent Limitations V.A.1.a of the Permit states pollutants may be discharged from the Facility if "the production area is designed, constructed, operated, and maintained to contain all manure, litter, and process wastewater including the runoff

and the direct precipitation from a 25-year, 24-hour rainfall event." In addition, Discharge Prohibition IV.B of the Permit states that a "disposal of manure to land is prohibited."

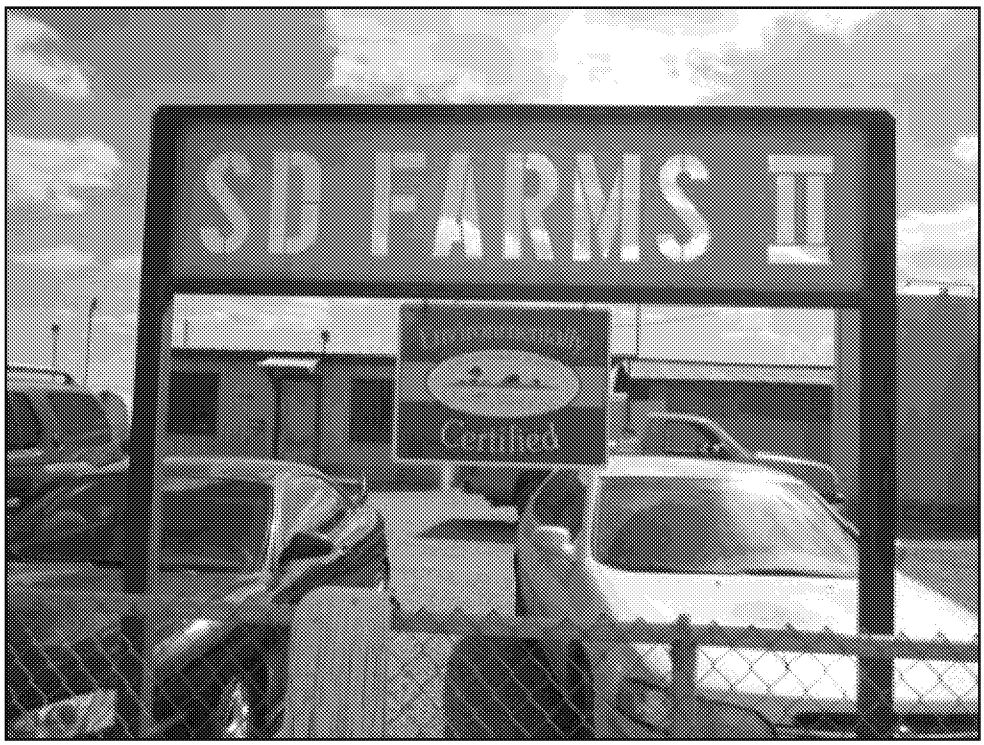
2. The inspector observed, during the inspection, an unidentified source of process wastewater that appeared to have been previously discharged offsite along the northern Facility perimeter onto the Chino Avenue right-of-way (refer to Photos 21 through 25). In addition, a PVC pipe leading from the Facility onto the Chino Avenue right-of-way was identified adjacent to the offsite ponding process wastewater. Mr. Leul stated that the process wastewater was a combination of milk truck wash water from a water spout on the north side of the milking barn and a previous overflow of irrigation water from an adjacent farmland on the north side of Chino Avenue. Mr. Leul was unaware of the PVC pipe outlet or the actual source at the time of the inspection. The inspector was unable to locate the inlet of the PVC pipe. The process wastewater observed on the Chino Avenue right-of-way appeared to have been discharged from the Facility, as no other water was observed along Chino Avenue. Discharge Prohibition IV.A states that the "Discharge of process wastewater and/or storm water runoff from manured areas to property not owned or controlled by the discharger, except as authorized by this order, is prohibited."

ITEMS FOR FOLLOW UP ON FUTURE INSPECTIONS

1. Verify whether or not the EWMP has been fully implemented onsite and is reflective of current Facility conditions

2. Ensure that manure is no longer being released offsite from the north-central corral north onto the Chino Avenue right-of-way

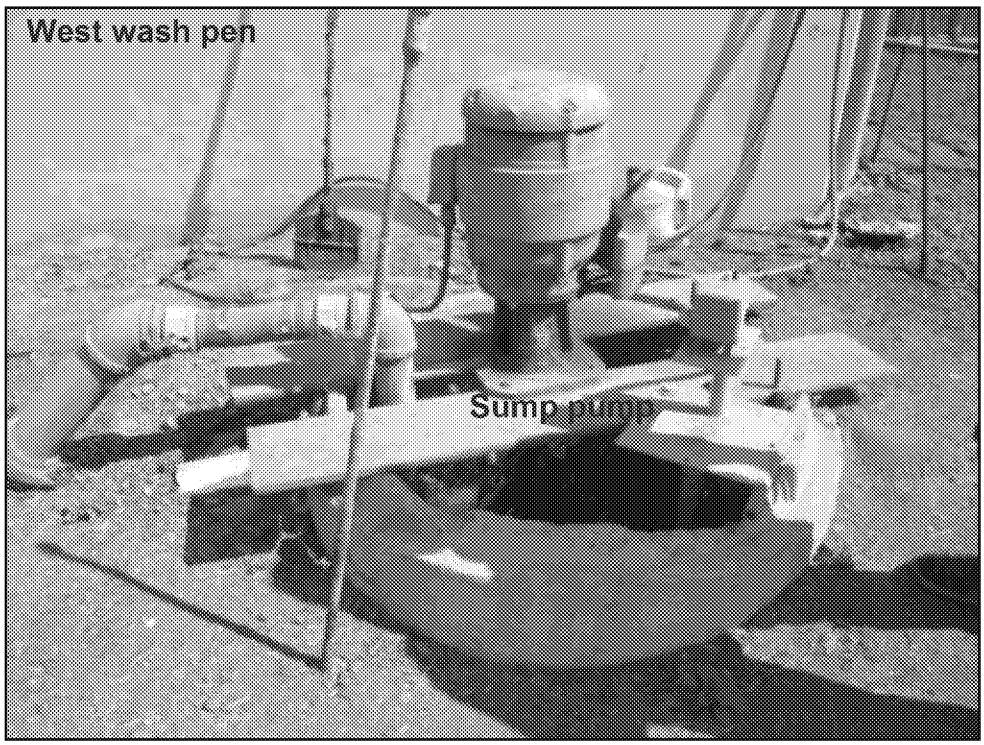
3. Verify the source of the unidentified process wastewater, adjacent to the milking barn, on the Chino Avenue right-of-way



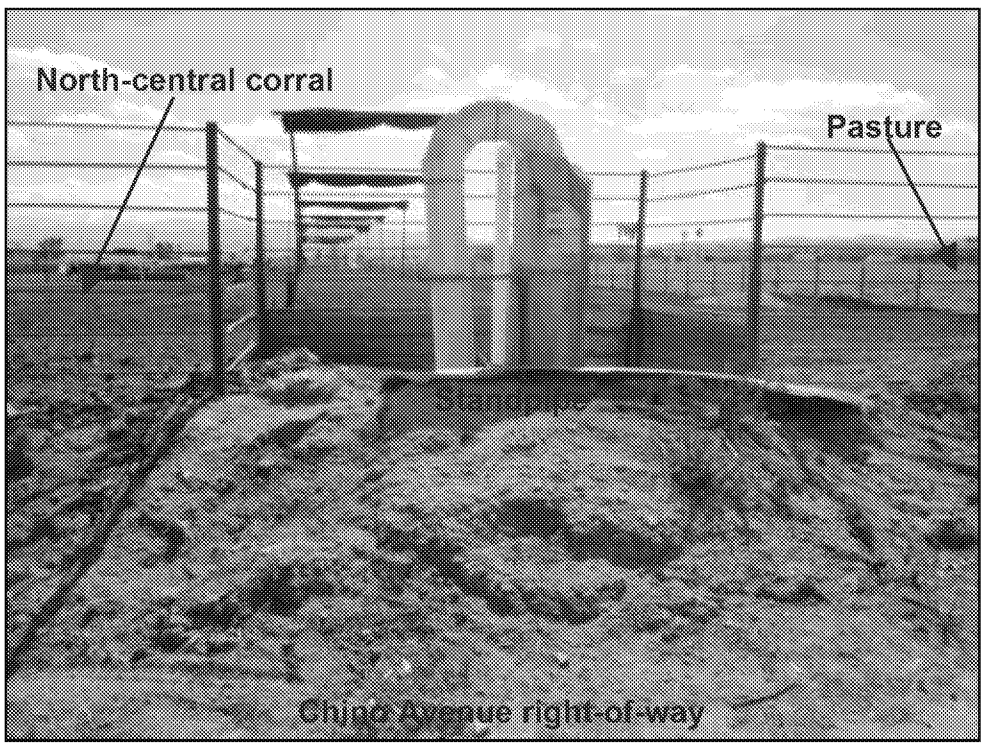
Photograph 1. SD Farms II Facility sign.

Photograph 2. View facing east of the milking barn process wastewater sump pump located on the west side of the west wash pen. Note the pump conveys process wastewater to Pond A located in the southern portion of the Facility and/or to the disposal pasture located in the northwestern portion of the Facility.

Inspection and Photograph Date: March 6, 2013

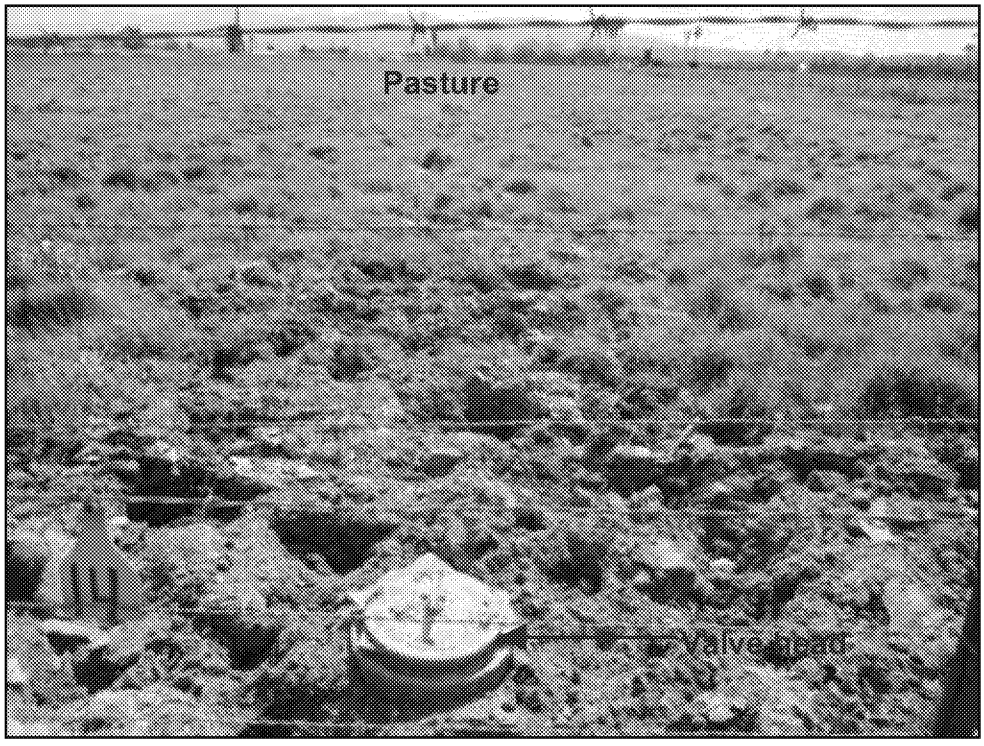


Photograph 3. Additional view of the milking barn process wastewater sump pump shown in Photograph 2.

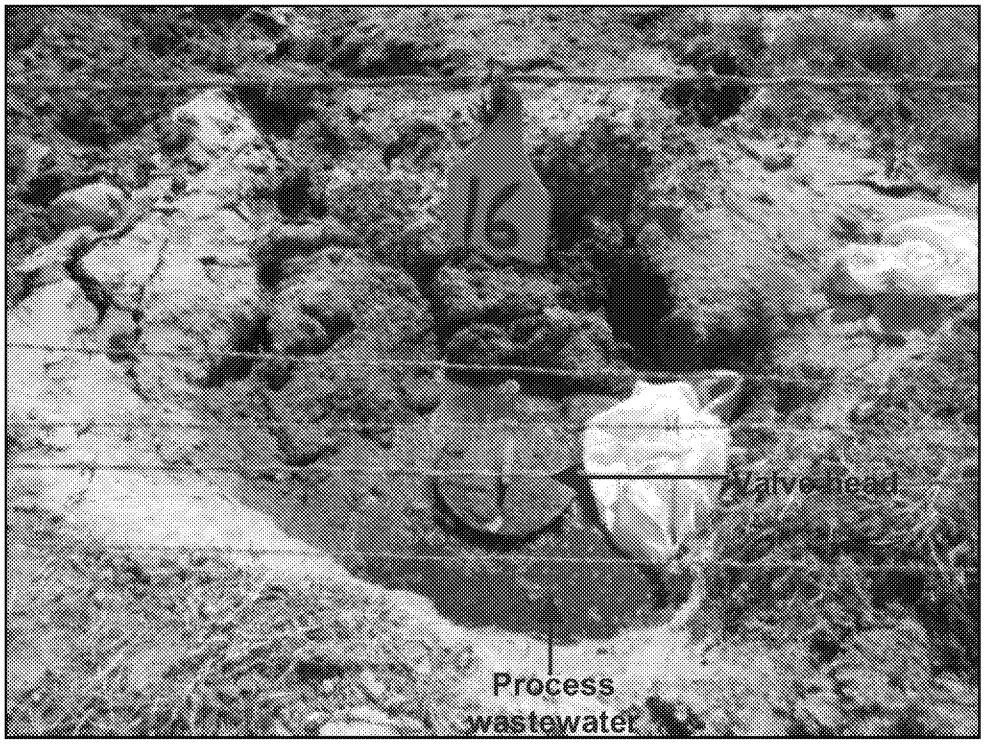


Photograph 4. View facing south of the process wastewater standpipe located on the north side of the north-central corral, adjacent to Chino Avenue.

Inspection and Photograph Date: March 6, 2013

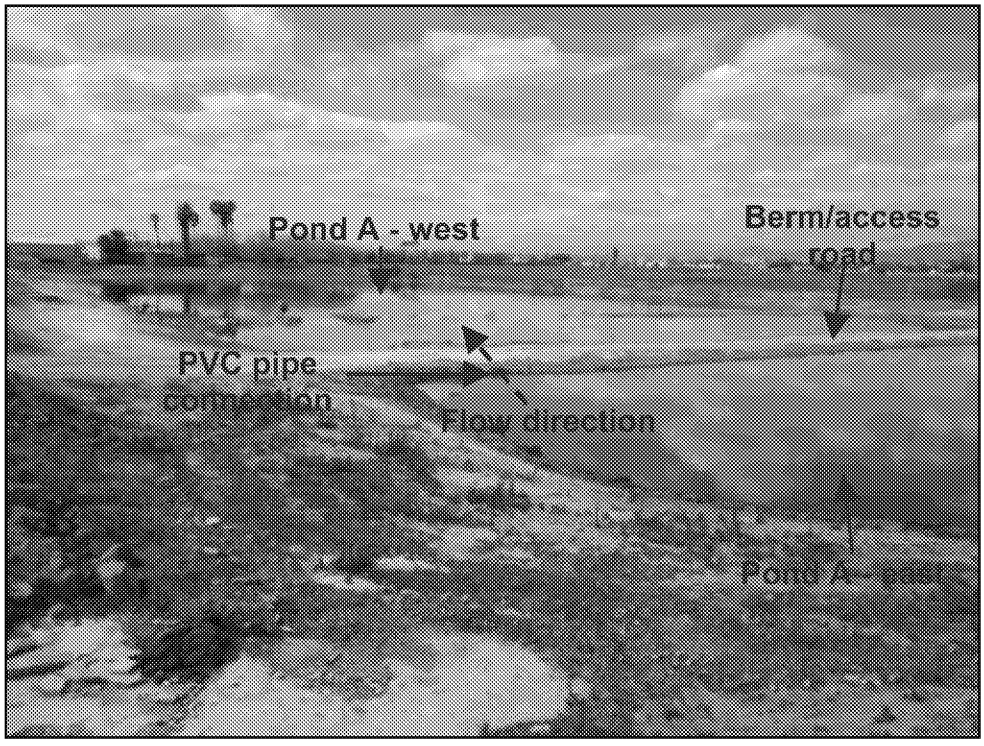


Photograph 5. View facing south of a valve head used for process wastewater land-application disposal located on the north side of the pasture in the northwestern portion of the Facility.

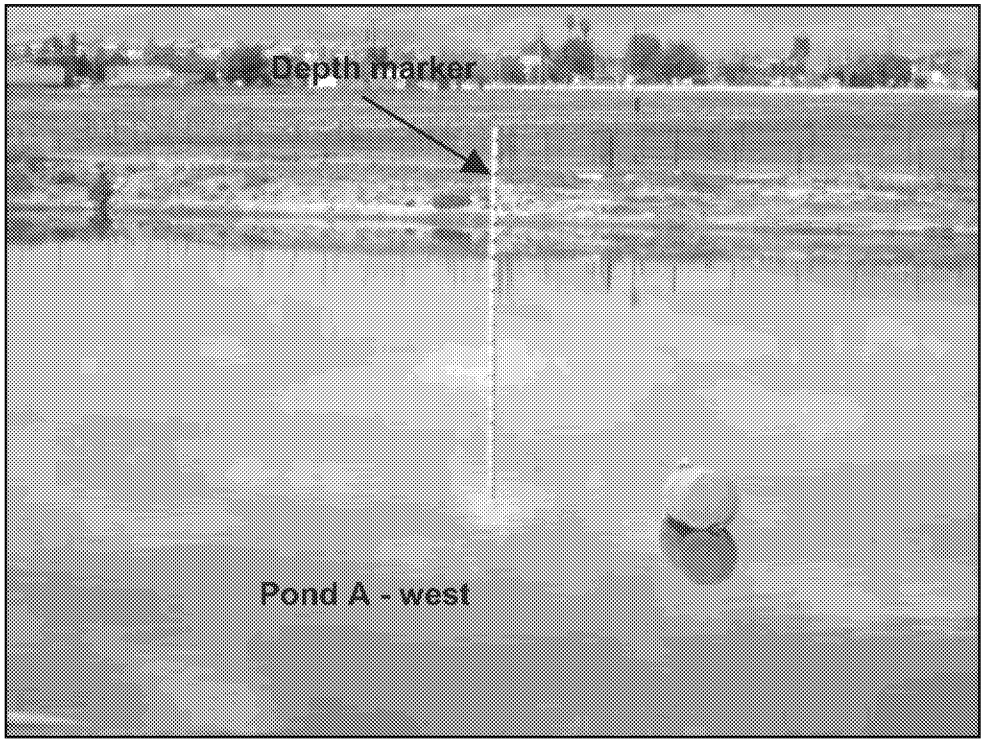


Photograph 6. Close-up view of an active valve head located in the pasture in the northwestern portion of the Facility.

Inspection and Photograph Date: March 6, 2013

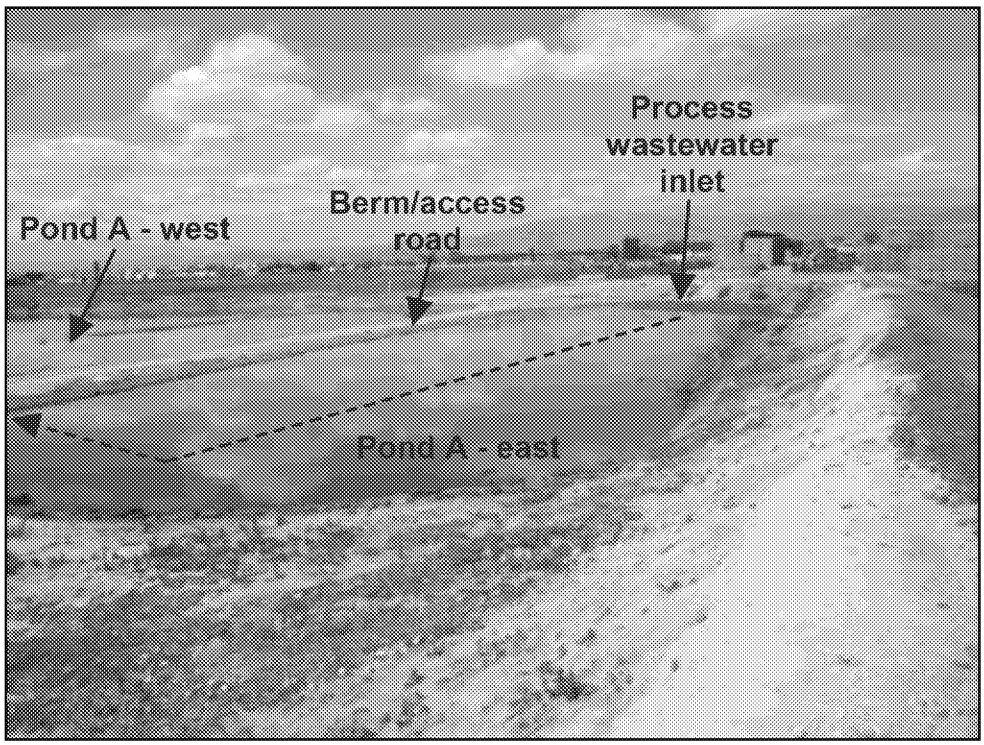


Photograph 7. View facing west of Pond A. Note the pond was divided into two sections by a low lying north-south berm/access road and was hydraulically connected via a PVC pipe on the south side.

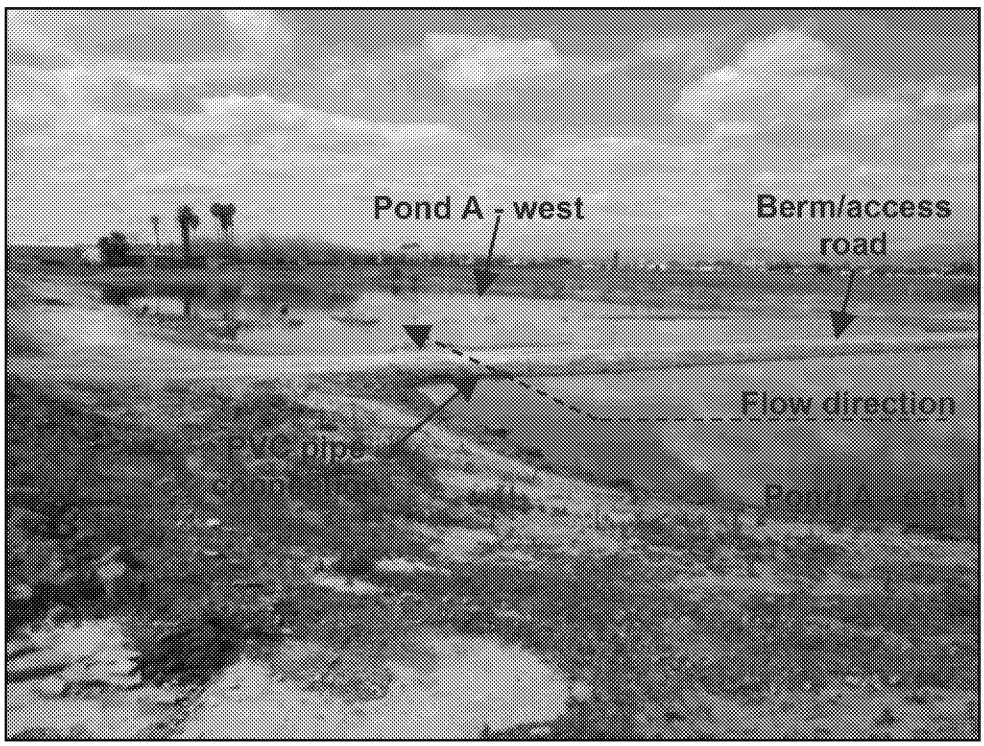


Photograph 8. View facing north of the depth marker located in Pond A.

Inspection and Photograph Date: March 6, 2013

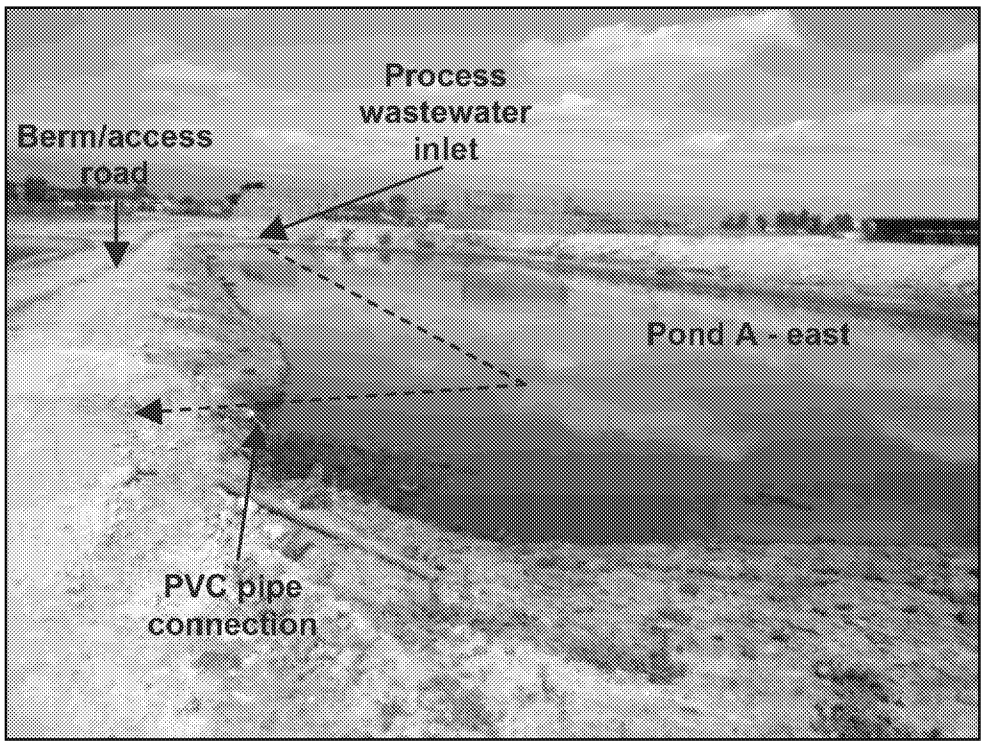


Photograph 9. View facing northwest of Pond A. Note process wastewater enters Pond A in the northeastern portion and eventually flows under the berm/access road via a PVC pipe into the western side of Pond A.

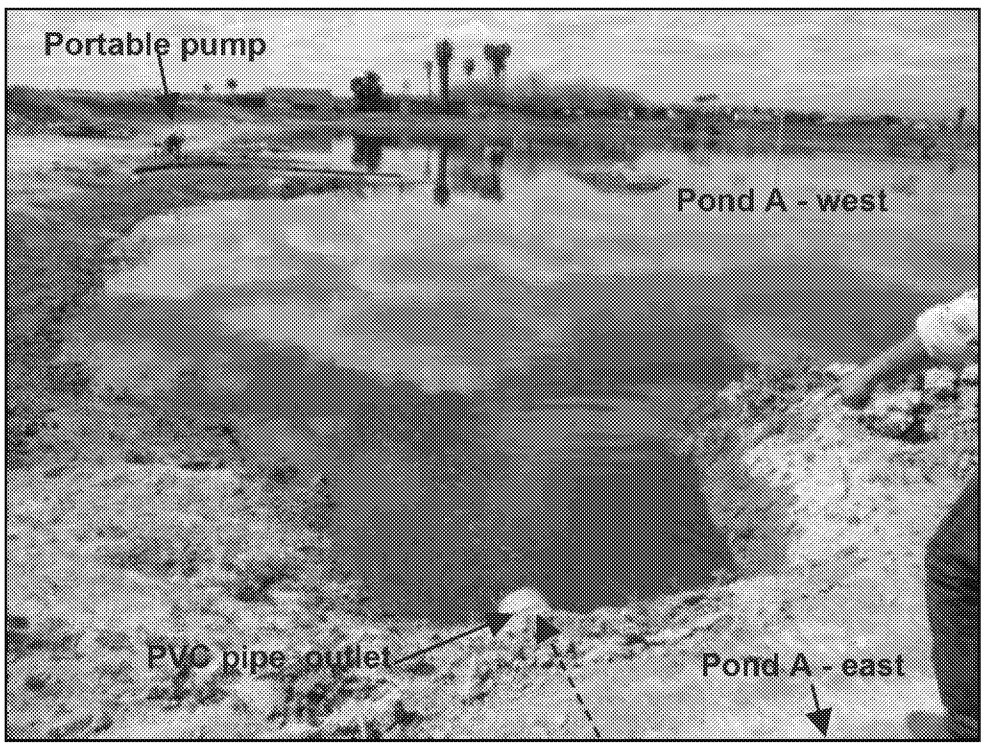


Photograph 10. View facing northwest of the flow direction through Pond A, shown in Photograph 9.

Inspection and Photograph Date: March 6, 2013

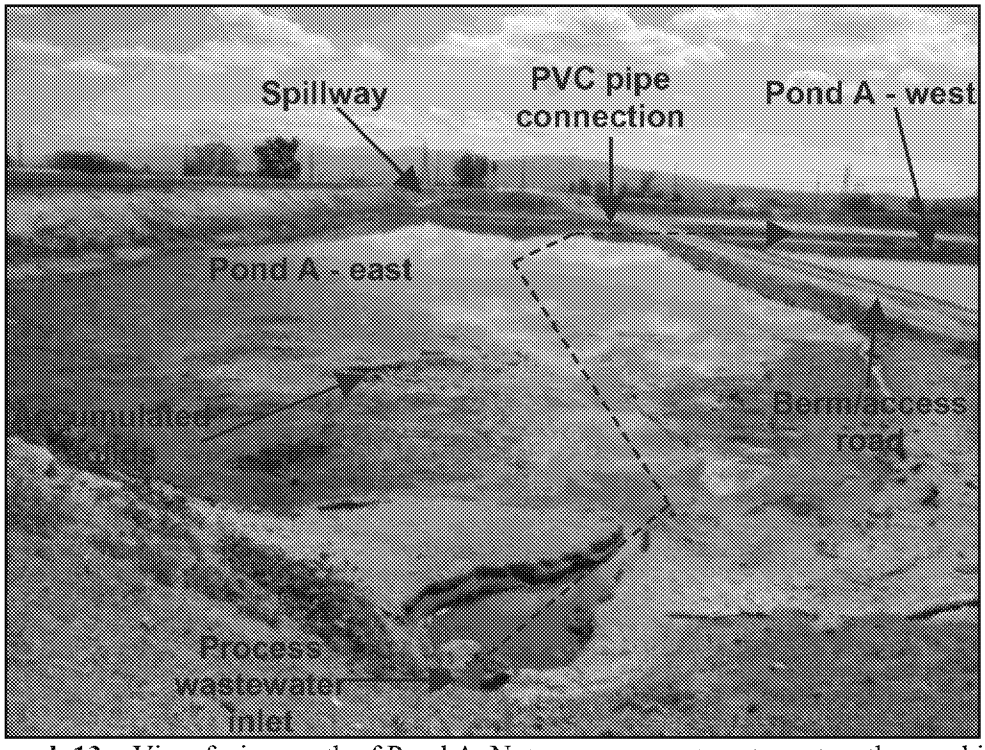


Photograph 11. View facing north of the eastern portion of Pond A. Note the flow pathway from the process wastewater inlet to the western portion of Pond A via a PVC pipe connection.

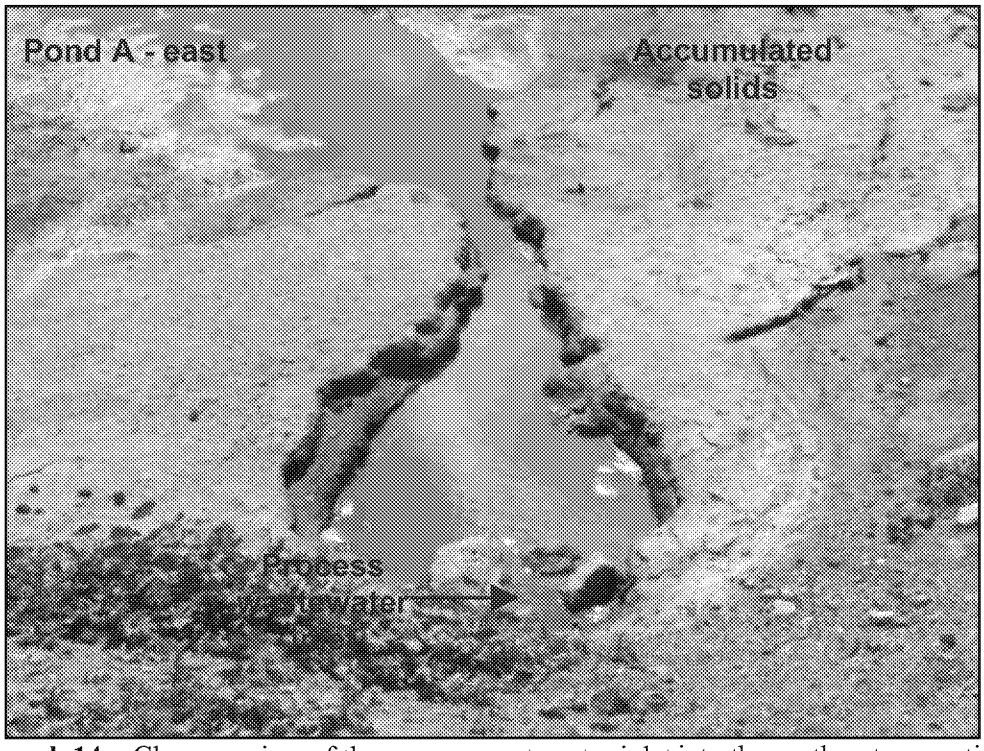


Photograph 12. View facing west of the PVC pipe outlet which drains the eastern portion of Pond A, shown in Photograph 11, into the western portion of Pond A.

Inspection and Photograph Date: March 6, 2013

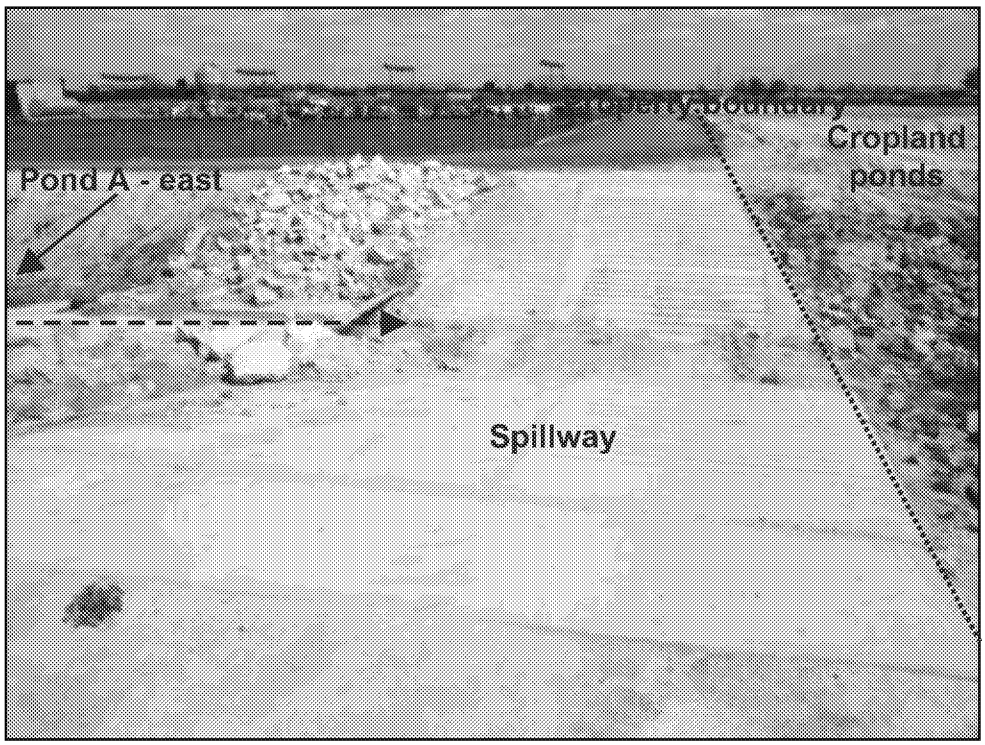


Photograph 13. View facing south of Pond A. Note process wastewater enters the pond in the northeastern portion of the pond and flows west underneath the berm/access road via a PVC pipe connection. Note the majority of solids appear to settle on the east side of Pond A adjacent to the inlet.

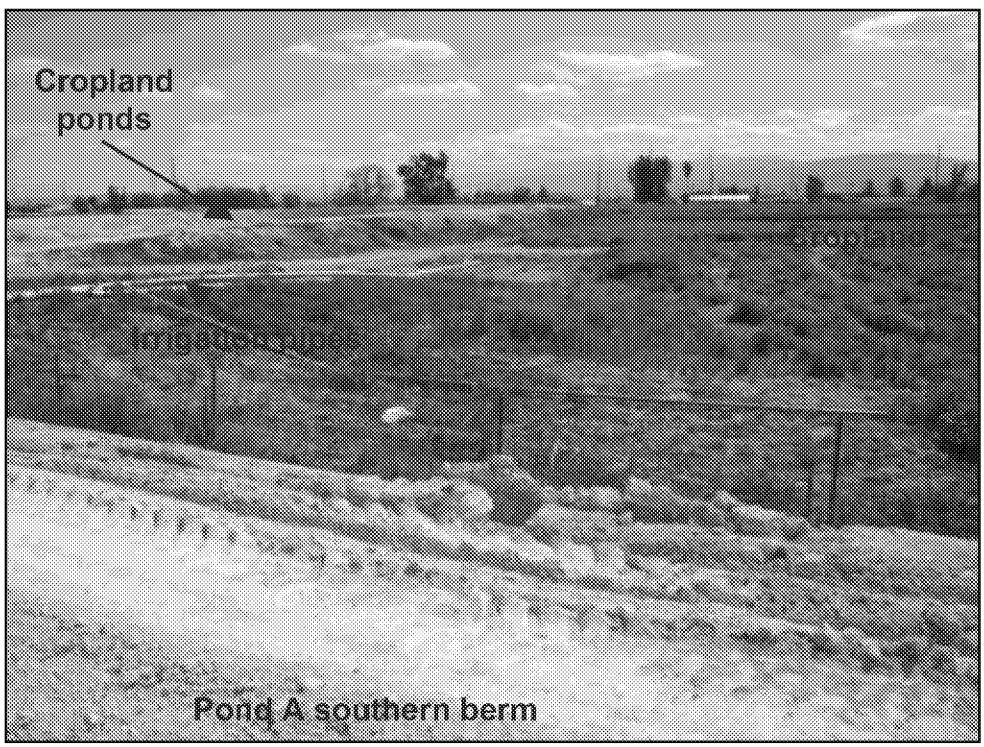


Photograph 14. Close-up view of the process wastewater inlet into the northeastern portion of Pond A, shown in Photograph 13. Note the majority of solids appear to accumulate in the east side of Pond A.

Inspection and Photograph Date: March 6, 2013

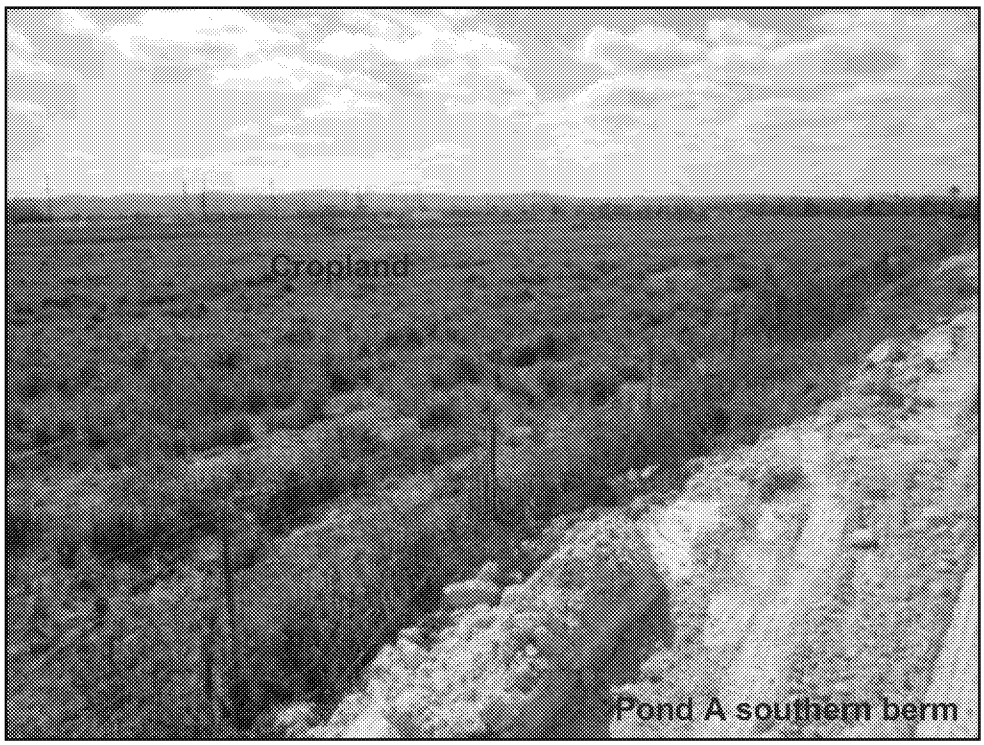


Photograph 15. View facing east of the concrete spillway located in the southeastern corner of Pond A. Note the spillway overflows to a containment pond located on the Discharger's adjacent cropland south of the Facility.

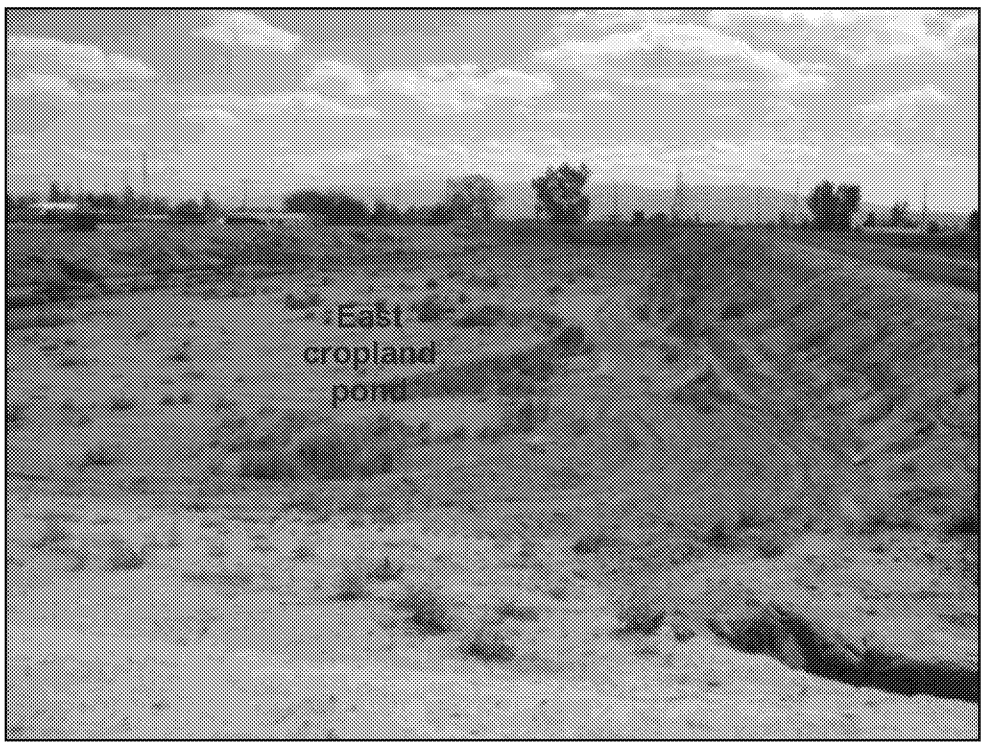


Photograph 16. View facing south of the adjacent cropland south of the Facility. Note this cropland is utilized for feed production at the Facility. Manure and wastewater is land applied here by the Discharger.

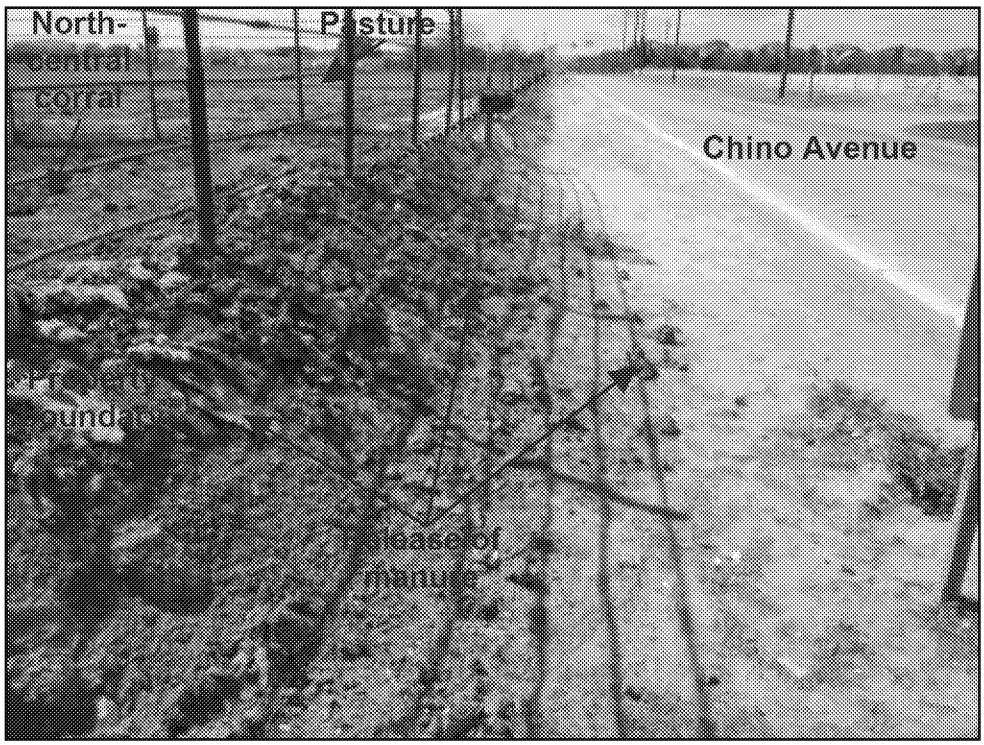
Inspection and Photograph Date: March 6, 2013



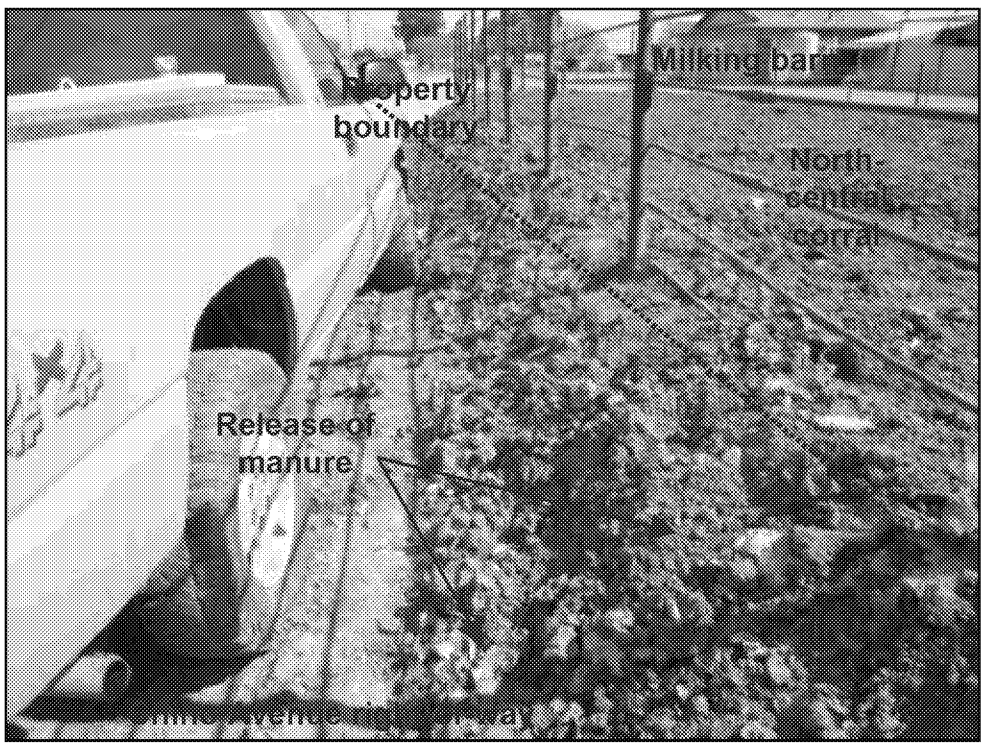
Photograph 17. View facing southwest of the cropland located south of the Facility. Note this cropland is utilized for feed production at the Facility.



Photograph 18. View facing south of the eastern pond in the northeastern corner of the cropland immediately south of the Facility. Note both ponds were dry at the cropland property.

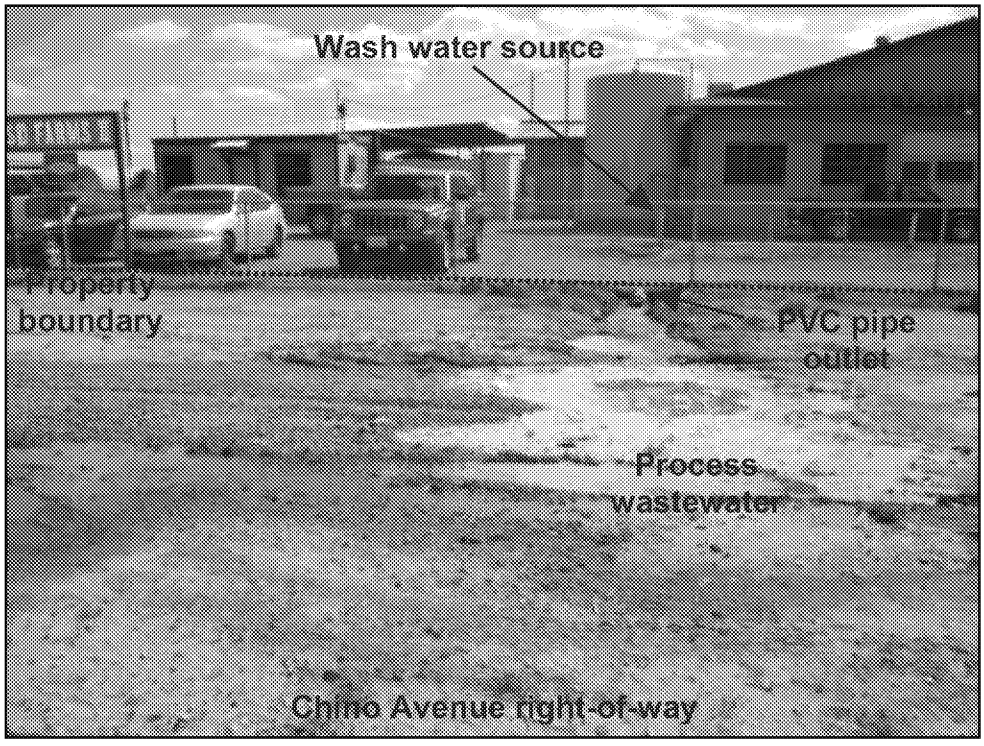


Photograph 19. View facing west of a release of manure offsite from the north-central corral onto the Chino Avenue right-of-way.

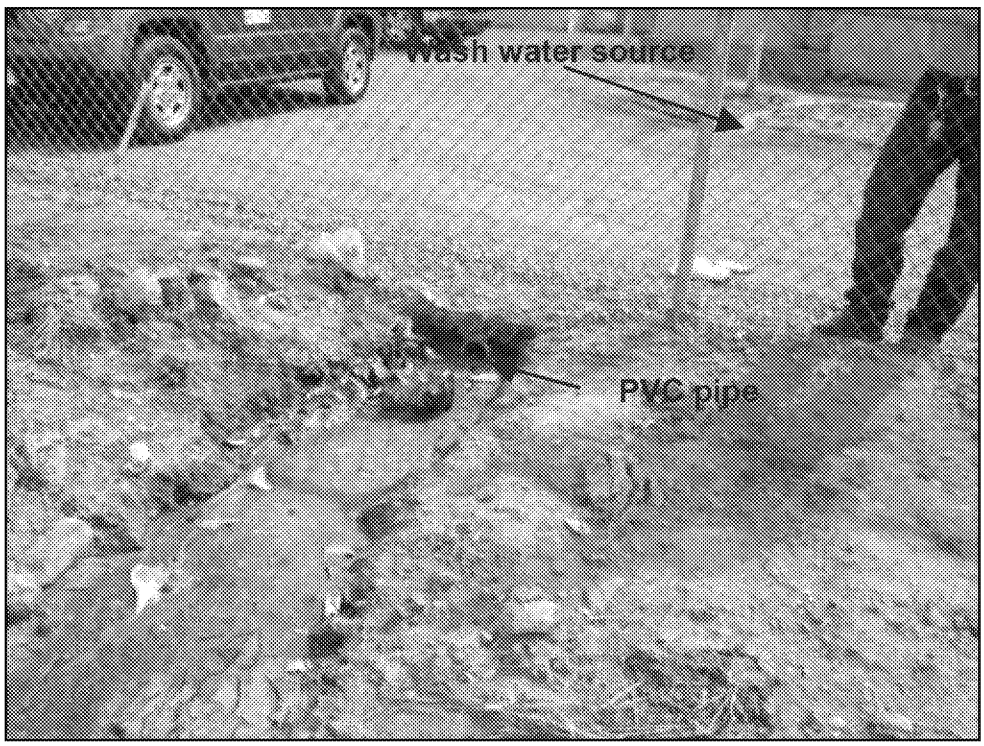


Photograph 20. View facing east of a release of manure offsite from the north-central corral onto the Chino Avenue right-of-way.

Inspection and Photograph Date: March 6, 2013



Photograph 21. View facing south of a discharge of process wastewater offsite onto the Chino Avenue right-of-way. Note the PVC pipe drain leading from the Facility wash bay onto the right-of-way. Facility staff stated the water was a combination of truck wash water and an adjacent farmland irrigation water discharge.



Photograph 22. Close-up view of the PVC pipe shown in Photograph 21.

Inspection and Photograph Date: March 6, 2013

Photograph 23. View facing east of the discharge of process wastewater offsite onto the Chino Avenue right-of-way. Note Facility staff stated the water was a combination of Facility truck wash water and an adjacent farm irrigation water discharge, on the north side of Chino Avenue.

Photograph 24. View facing south of a discharge of process wastewater offsite onto the Chino Avenue right-of-way. Note the PVC pipe leading from the Facility, shown in Photographs 21 and 22.

Inspection and Photograph Date: March 6, 2013

Photograph 25. Close-up view facing south of the PVC pipe leading from the Facility, shown in Photographs 21, 22, and 24.